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January 24, 2025

VIA ECF

Honorable Mary Kay Vyskocil
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Re: ***Johnson, et al. v. Teachers College Columbia University, et al.***
Docket No.: 1:24-cv-04811
Our File No.: 22643.00086

Dear Judge Vyskocil:

We represent defendant Teachers College Columbia University in the above-referenced matter. We write jointly with plaintiffs' counsel to provide the Court with a status update and the progress of discovery. *See* Dkt. No. 32.

The parties would like to sincerely apologize to the Court for inadvertently missing the Court's pre-imposed deadline to submit a joint letter regarding discovery. We can assure the Court that the parties will be more cognizant of the Court's orders to ensure full compliance.

As to an update on this matter, defendant Teachers College served plaintiffs with discovery demands on December 9, 2024. Plaintiffs have requested an extension to respond, which is currently set for January 31, 2025. Defendant Teachers College will promptly process any authorizations that are included within plaintiffs' responses so that the parties may proceed with depositions. To date, plaintiffs have not served discovery demands on defendant Teachers College. Based on the foregoing, as well as the complexities of the claims asserted by three plaintiffs which includes the complexity of anticipated remaining discovery, the retrieval of medical records for the plaintiffs, the fact that the case involves three plaintiffs including one who resides out of state and another who has been placed on bedrest by her treating physicians and is due to give birth in the coming weeks, and the need to subpoena non-party witnesses for deposition, the parties pre-emptively anticipate that an extension of discovery will be needed and respectfully request that the fact discovery deadline, currently set for March 10, 2025, be extended by 60 days to May 9, 2025.

We thank the Court for its continued time and attention in this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Nancy V. Wright', written over a horizontal line.

Nancy V. Wright
Stefanie L. Shmil



cc: Gabrielle Vinci (*via ECF*)
Nesenoff & Miltenberg, LLP
Attorney for Plaintiffs